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February 22, 2021

Via ECF

The Honorable Susan D. Wigenton
United States District Court
District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101

Re: CJH Enterprises LLC d/b/a Lucky's Leash v. Tekno Products Inc. et al
Case No.: 2:20-cv-15067(SDW)(LDW)

Dear Judge Wigenton:

This firm represents Plaintiff CJH Enterprises LLC d/b/a Lucky's Leash ("Plaintiff") in this matter. We respectfully request, on behalf of all parties, that the Court *extend the time for Plaintiff to respond to Defendant Tekno Product Inc.'s ("Tekno") Counterclaims from today through and March 22, 2021. This is Plaintiff's third request for an extension regarding Tekno's Counterclaims.

Additionally, on January 27, 2021 Your Honor granted Plaintiff's second request to extend the briefing schedule regarding Defendant Jeff Kurani's ("Kurani") motion to dismiss. Although Your Honor ordered that there would be no further extensions, the parties continue to progress in settlement discussions and therefore respectfully request that the Court reconsider and **extend the briefing schedule so that the following deadlines are in place: (1) the motion to dismiss is adjourned to May 3, 2021; (2) Plaintiff's opposition papers so as to be received via email is extended from March 5, 2021 to April 5, 2021; and (3) Kurani's reply papers so as to be received via email is extended from March 26, 2021 to April 26, 2021. Kurani consents to an extension. This is Plaintiff's third request for an extension regarding Kurani's motion to dismiss.

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The requested extensions will allow the Parties to focus on resolution and the parties have made progress in that regard.

Respectfully submitted,
/s/ Andrew Kazin
Andrew Kazin

cc: All parties (via ECF and email)

*The request is granted. The extension is final.

**The request is granted. The Court notes that the last extension was marked final, but will grant one additional extension. THERE SHALL BE NO FURTHER EXTENSIONS.

***The Clerk of Court is directed to terminate the motion at ECF No. 20.

SO ORDERED.

s/ Leda Dunn Wettre, U.S.M.J.

Dated: 2/23/2021